

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

CHERYL SAGATAW, DEANTHONY  
BARNES, ROBERTA STRONG,  
TRAVIS NELOMS, ALVIN  
BUTCHER, ADRIAN TIGER,  
CHANCE ASKENETTE, DEVEN  
CASTON, LOLA HEGSTROM, and  
RONDEL APPLEBEE, *on behalf of  
themselves and a class of  
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his  
individual and official capacity,*

Defendant.

Civil Action

0:24-cv-00001-ECT/TNL

**MOTION TO  
AMEND OPERATIVE  
COMPLAINT  
AND TO ADD PLAINTIFFS**

---

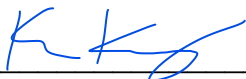
NOW COME Cheryl Sagataw, DeAnthony Barnes, Roberta Strong, and Travis Neloms, Plaintiffs; and Alvin Butcher, Adrian Tiger, Chance Askenette, Deven Caston, Lola Hegstrom, and RonDel Applebee, prospective Plaintiffs; by and through the undersigned attorney, and respectfully move this Court for leave to file

a Second Amended Complaint in this proceeding pursuant to Federal Rule of Civil Procedure 15(a)(2).

In accordance with Rule 15.1(b), attached hereto as Exhibit A is a copy of the proposed amended pleading, and as Exhibit B a redline version of the same showing how the proposed amended pleading differs from the operative pleading, ECF No. 30. These Exhibits are identical to those filed on September 15, 2024 (ECF No. 81, Exh. A and Exh. B).

Signed,

Date: September 24, 2024

  
KIRA A. KELLEY  
Climate Defense Project  
MN Bar No. 0402932  
P.O. Box 7040  
Minneapolis, MN 55407  
(802) 683-4086  
kira@climatedefenseproject.org

*Attorney for Plaintiffs*